

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SLAWOMIR CELINSKI,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 08 CV 4126
)	
JONATHAN A. MIRSKI and)	Judge Manning
UNI-SYSTEMS, INC.)	Magistrate Valdez
)	
Defendants.)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **August 19, 2008** at **11:00 a.m.**, we shall present the attached **Defendants, Jonathan A. Mirski and Uni-Systems, Inc.'s Motion for an Extension of Time until August 19, 2008 to file an Answer to Count I of Plaintiff's Complaint at Law** before the Honorable United States District **Judge Manning** in Courtroom **2125** at the United States District Courthouse, Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois 60604. A true and correct copy of the motion has been served upon you.

/s/ Kevin W. Doherty
Kevin W. Doherty

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion has been served on:

kdoran@doranmedina.com

j.t.m.moran@gmail.com

by e-filing this **11th** day of **August**, 2008.

/s/ Kevin W. Doherty
Kevin W. Doherty

Kevin W. Doherty (ARDC No.: 3128844)
Brian T. Ginley (ARDC No.: 6281463)
DOHERTY & PROGAR LLC
200 West Adams Street, Suite 2220
Chicago, Illinois 60606
(312) 630-9630
(312) 630-9001 (fax)

3. On August 4, 2008, the Honorable Blanche M. Manning granted the Defendants' Agreed Motion for Extension of Time to answer or otherwise plead to Plaintiff's Complaint at Law. The Defendants were given until August 11, 2008 to answer or otherwise plead to Plaintiff's Complaint at Law.

4. That KEVIN W. DOHERTY, BRIAN T. GINLEY, and DOHERTY & PROGAR, have recently been retained to represent the interests of the Defendants, JONATHAN A. MIRSKI and UNI-SYSTEMS, INC.

5. That Defendants' new counsel needs a short period of additional time to investigate the allegations of the Plaintiff's Complaint at Law and are seeking an additional eight (8) days until August 19, 2008 to answer or otherwise plead to the Plaintiff's Complaint at Law.

WHEREFORE, the Defendants, JONATHAN A. MIRSKI and UNI-SYSTEMS, INC., pray that this Honorable Court grant their Motion for Extension of Time to Answer Count I of Plaintiff's Complaint at Law and allow the Defendants until August 19, 2008 to file their Answers to Count I of Plaintiff's Complaint at Law.

Respectfully submitted,

JONATHAN A. MIRSKI and UNI-SYSTEMS,
INC.

By: /s/ Kevin W. Doherty
Kevin W. Doherty
One of their Attorneys

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